

Aviva's Privacy Policy

When you apply to Aviva for any type of insurance, you disclose a certain amount of information about yourself and your family to us. It is a general policy of Aviva to maintain strict confidentiality with regard to all information obtained in the course of our business. Specifically, it is Aviva's policy to:

- › *Collect only information necessary or relevant to our business;*
- › *Use only legitimate means to collect information;*
- › *Disclose information to third parties only for legitimate business purposes and as allowed by law; and*
- › *Limit access to your personal information to those who need to know.*

For continued assurance that Aviva is protecting your personal information, we will notify you annually of our privacy policy. We may amend our privacy policy from time to time and when we do, we will send you a revised privacy notice.

What types of information does Aviva collect about you and from whom?

We obtain most of our information directly from you on the application or in telephone conversations with you during the application process. Depending on the nature of your insurance transaction, we may need additional information about you or other individuals applying for coverage.

Who is Aviva?

Aviva is a breath of fresh air. Aviva is about energy and ideas, hopes and dreams. We're about where you're going, not where you've been. We seek not only to understand your needs but also to help meet them. We are committed to establishing better and more innovative ways to serve our customers. Our company is bound together by the shared values of integrity, progressiveness, performance and teamwork. Our commitment to a conservative investment philosophy has enabled us to consistently earn strong industry ratings. While we are solely responsible for our obligations to contract holders, we are also proud to be a subsidiary of Aviva plc, one of the 10 largest insurance groups in the world. Our ultimate parent company has a corporate lineage that dates back to 1696 in London, England, and has a history of keeping promises in each of five centuries. This history combined with our vision helps us to help you make the most out of life.

Keeping customer information secure is a top priority for all of us at Aviva Life Insurance Company ("Aviva").

We respect the privacy concerns of our customers who obtain products or services from us.

We created this notice to help you understand what information we collect and how we may disclose it.

Aviva applies the same policies to former customers that it applies to current customers.

We may obtain non-public personal information about you from some or all of the following sources:

- › *Financial Information - such as credit history, banking information and account numbers;*
- › *Public Records - such as driver's license number and driving history;*
- › *Consumer Reporting Agencies - such as credit reports;*
- › *Employment Information - such as your occupation and employer;*
- › *Medical Information - such as physicians, hospitals or other medical care institutions, and the Medical Information Bureau; and*
- › *General Information - such as birth date, social security number and address.*

What does Aviva do with the information collected about you?

We review the information collected about you when evaluating requests for insurance coverage and in determining your life insurance premiums. We will also maintain this information in our contract records and may use it for purposes related to issuing and servicing annuity and life insurance contracts and settling claims.

Aviva may also use this information (except health information) to identify opportunities for you to learn more about Aviva products and services that may enhance your overall insurance program.

To whom does Aviva disclose information about you?

We recognize that some of our customers do not want their information shared with non-affiliated third parties for marketing purposes. You can be assured that Aviva does not participate in this practice. Therefore, you do not need to take any action regarding this notice except to file it with your contract.

We may disclose some or all of the non-public personal information we obtain about you to the following types of affiliated third parties:

- › *Service Corporations - For example, we may share your non-public personal information with certain service companies so that they may underwrite applications, administer policies and/or investigate claims involving you.*

We are permitted by law to share non-public personal information about you with the following types of non-affiliated third parties:

- › *Insurance regulatory agencies in connection with the regulation of our business;*
- › *Law enforcement or other governmental authority to protect our legal interests or in cases of suspected fraud or illegal activities;*
- › *Persons authorized by subpoena, warrant or other court order as required by law;*
- › *Businesses that help us maintain our databases, security systems and web site;*
- › *Information bureaus such as the Medical Information Bureau that assist us in verifying information on your application;*
- › *Insurance support organizations established to collect information for the purposes of detecting and preventing insurance crimes and fraudulent claims;*
- › *Reinsurance companies in connection with determination of eligibility for reinsurance, and;*
- › *A consumer reporting agency in accordance with the Fair Credit Reporting Act.*

How does Aviva protect information about you?

Your non-public personal information is protected by law and the procedures described in this notice. Access to your non-public personal information is restricted to those affiliates, employees and/or third parties who need to know that information in order to issue and service your contract. We maintain physical, procedural and electronic safeguards that comply with federal and state regulations to guard your non-public personal information.

We will continue to adhere to the privacy policies and practices described in this notice, regardless of whether we issue you an insurance contract or you decide to surrender your Aviva contract.

How can you learn more about Aviva's Privacy Policy?

If you have questions about the information in this notice, please write to us:

Customer Service - Privacy Coordinator
Aviva Life Insurance Company
108 Myrtle Street
North Quincy, Massachusetts 02171

Please provide your complete name, address, date of birth, type of contract held, and the nature of your question or concern. We will report the outcome of your inquiry to you.

How can you obtain additional information?

If you have further questions, please write to us at the above address or contact us directly by calling (800) 343-5660.